

EXHIBIT 17

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW JERSEY

- - -

IN RE: JOHNSON & :
JOHNSON TALCUM POWDER :
PRODUCTS MARKETING, :
SALES PRACTICES, AND : NO. 16-2738
PRODUCTS LIABILITY : (FLW) (LHG)
LITIGATION :
: THIS DOCUMENT RELATES :
TO ALL CASES :
-

January 21, 2019

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Videotaped deposition of
JUDITH ZELIKOFF Ph.D., taken pursuant to
notice, was held at the Sheraton Mahwah
Hotel, 1 International Boulevard, Mahwah,
New Jersey, beginning at 9:11 a.m., on
the above date, before Michelle L. Gray,
a Registered Professional Reporter,
Certified Shorthand Reporter, Certified
Realtime Reporter, and Notary Public.

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1 Q. Did you do analysis of
2 biologic plausibility for talc without
3 asbestos?

4 MS. O'DELL: Objection to
5 form.

6 THE WITNESS: My biological
7 assessment, my -- my biological
8 plausibility was looking at the
9 entire product of talcum powder.

10 BY MR. HEGARTY:

11 Q. And how do you define the
12 entire product?

13 A. The entire product is
14 whatever are the ingredients or listed
15 within the documents or the test results
16 from Imerys that -- that indicate what
17 they measured, including the metals, the
18 asbestos, the -- the asbestiform fibers,
19 the fragrances.

20 Q. So you did your biologic
21 plausibility analysis with -- based on
22 talc that has asbestos, heavy metals and
23 fragrance in it, correct?

24 MS. O'DELL: Objection to

1 form.

2 THE WITNESS: I did my
3 biological plausibility on talcum
4 powder products.

5 I looked at individual
6 products, individual constituents
7 in adding to my -- to my report,
8 to my document. But I looked at
9 the entire product. And it is my
10 opinion that the entire product
11 causes inflammation and that
12 inflammation then goes on as a
13 triggering mechanism to turn on
14 certain genes and to bind iron
15 that can lead to the changes
16 needed for cancer in the ovary.

17 BY MR. HEGARTY:

18 Q. You did not do a separate
19 analysis of talc without asbestos or
20 without -- and without heavy metals and
21 without fragrance, correct?

22 MS. O'DELL: Object to the
23 form.

24 THE WITNESS: I'm not even

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1 sure how that would be done or I
2 don't think it could be done.

3 What I did was I did it for
4 the entire product.

5 BY MR. HEGARTY:

6 Q. And what do you -- what do
7 you think -- what is your opinion --
8 strike that.

9 What is in the entire
10 product in your opinion?

11 A. Based upon the Johnson &
12 Johnson documents. That's where my --
13 that's where I will tell you what is in
14 there.

15 As -- as far as the product
16 documents, it indicates that there are
17 metals, including -- not -- not totally
18 inclusive of, but to mention a few of the
19 more well-known ones, cobalt, chromium
20 and nickel.

21 There are also, according to
22 the Crowley report, there are also many
23 chemicals that make up a fragrance. And
24 there -- and in many of the samples

1 of that. However many of the documents
2 and many of the studies including the
3 Longo supplement did compare, for
4 example, I think I misspoke when I said
5 one of the places that Johnson & Johnson
6 gets their talc is Korea. What I meant
7 was China. I should have said Asia. So
8 Korea is also a mine that provided, but
9 not to Johnson & Johnson.

10 MS. O'DELL: Hey, Mark,
11 we've been going about an hour and
12 15 minutes.

13 MR. HEGARTY: Okay.

14 MS. O'DELL: Can we take a
15 break?

16 MR. HEGARTY: Yeah.

17 THE VIDEOGRAPHER: The time
18 is 2:27 p.m. Off the record.

19 (Short break.)

20 THE VIDEOGRAPHER: We are
21 back on the record. The time is
22 2:45 p.m.

23 BY MR. HEGARTY:

24 Q. Doctor, if evidence was that

1 there is no asbestos in Johnson's Baby
2 Powder, would that change your opinions
3 as to biological plausibility?

4 A. No, sir, it would not.

5 Q. Same question with regard to
6 heavy metals. If there were no heavy
7 metals in Johnson's Baby Powder, would
8 that change your opinions on biological
9 plausibility?

10 A. I looked at the entire
11 product and it would not -- it would not
12 change my opinion, as it exists
13 currently, with biological plausibility
14 that it would cause ovarian cancer
15 through -- through inflammation, is my
16 opinion.

17 Q. In looking at your heavy
18 metals section, beginning at Page 8 of
19 your report -- are you there?

20 A. I'm not. I had to put my
21 glasses on. Thank you.

22 Q. There are no studies that
23 have looked at the effects of these
24 metals in powder dusted on the perineum,